Conduit Analysis

Where we are and where we are going….

October 21, 2021

EPA Letter Summary

September 16th EPA Letter:

- Conduct Conduit Analysis on AE areas overlain with beneficial use aquifers and remediate conduits prior to AE submission to EPA.

- Submit a schedule by October 15th for submitting all remaining AE packages to EPA by no later than September 30, 2022.

State's October 15th State Response Letter:

California commits to taking the following by **September 30, 2022**:

1. Complete and submit the three aquifer exemption packages (Lynch Canyon, Lompoc and Sespe) that do not require conduit analysis to the US EPA, with Sespe being sent to the US EPA immediately;
2. For the six aquifer exemption packages requiring conduit analysis, complete a review and identify problem wells located within active injection areas;
3. Require operator specific work plans for approval by the State at the completion of each conduit analysis addressing identified problem wells on an ambitious timeline, otherwise affected operations will be shut in.

By **December 31, 2021** the State will provide an updated schedule for completing all remaining packages as soon as the conduit analysis scoping is complete.

Fluid Conduit Study Scope

- Well integrity evaluations on idle and abandoned wells located in a proposed AE area that are overlain by beneficial use aquifers.
- Focus will be wells in current project AORs

Number of Idle/Plugged Wells Located in Proposed AE area

Field	Idle	Plugged	Total
Holser	1	4	**5**
Oxnard	59	38	**97**
Cat Canyon	161	229	**390**
Mount Poso	-	5	**5**
Midway Sunset	30	96	**126**
Kern River	100	283	**383**

On basis of the well count, Holser and Mount Poso will require minimum time, effort, and resources. The Cat Canyon and Kern River field conduit study will require maximum time, effort and resources.

Review Approach- Updated 11/18/2021

- CalGEM will leverage the existing regulations to complete the review.
- CalGEM approach is to prioritize PxP reviews within the AEs and to request additional information for the well outside the existing AORs.
- This approach will help make progress on the project-by-project reviews, and by doing so, prioritize workload that helps ensure existing operations are operating in a manner that protects underground drinking water.
- CalGEM will review wells in the proposed exemption area with overlying beneficial use groundwater with a focus on casing integrity and cementing.
- Water Boards staff will review and evaluate wells in the proposed exemption area with overlying beneficial use groundwater. The number of wells reviewed by staff will be determined on a case-by-case basis.

Operators and Projects Impacted

Cat Canyon	AERA, B.E.Conway, CRC, Cat Canyon Resources, Miocene Operating, Team Operating, Vaquero	13
Oxnard	ABA Energy, CRC, Peal operator	3
Holser	Carbon California	0
Mt. Poso	Petro Resources, Petro-lud, Cimarron Oil	0
Kern River	Chevron	9
MWSS	AERA, Berry, CRC, Chevron, Holmes Western, Seneca, Sentinel Peak	9

Data Submission Deadlines for Operators

Holser (5) and Mount Poso (5) : **2 weeks**

Oxnard (97) and Midway Sunset (126) : **3 months**

The operator can transmit data after completing the review of every 15-20 wells. The parallel review by the State while the operator continues to submit data for the Oxnard field will help expedite the conduit study.

Kern River (383) and Cat Canyon (390): **5-6 months**

The operator can transmit data after completing the review of every 50 wells. The parallel review for the Kern River and Cat Canyon will help expedite the conduit study.

Work Plan

- ✓ **October 11-22**: CalGEM and WB complete the data request template for operators. Finalize UIC project identification and operators affected by conduit analysis.
- ✓ **October 18**: Reach out and schedule meeting with Mt. Poso and Holser Operators for Oct. 25.
- **October 25**: CalGEM meet with Mt. Poso and Holser operators. 2-week turnaround.
- **November 9-17**: CalGEM review data received with early data requests, adjust data template, as necessary. Finalize with WB.
- **November 18-19**: CalGEM and the Water Boards will meet with operators to provide information regarding the scope of fluid conduit review and get feedback on proposed timelines. Feedback due December 8th.
- **November 22-26**: Thanksgiving Holiday Week
- **December 9-17**: CalGEM work with WB to finalize AE Gantt Chart.
- **December 17**: State submit remaining AE timelines, including conduit analysis to EPA. Due December 31st .